

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:) Chapter 11
FREE SPEECH SYSTEMS LLC,) Case No. 22-60043
)
Debtor.)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:) Chapter 11
ALEX E. JONES,) Case No. 22-33553
)
Debtor.)

**SUBCHAPTER V TRUSTEE’S EMERGENCY MOTION FOR THE
APPOINTMENT OF A JUDICIAL MEDIATOR**

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing. Represented parties should act through their attorney.

Emergency relief has been requested. The Subchapter V Trustee requests consideration of this Motion not later than March 29, 2024.

If the Court considers the motion on an emergency basis, then you will have less than 21 days to answer. If you object to the requested relief or if you believe that the emergency consideration is not warranted, you should file an immediate response.

To Judge Christopher López, United States Bankruptcy Judge:

Melissa Haselden, (the “**Subchapter V Trustee**”), files this Emergency Motion for the Appointment of a Judicial Mediator (“**Motion**”), and represents as follows:

SUMMARY OF THE EMERGENCY APPLICATION

1. The Trustee seeks the appointment of a mediator to moderate the in person meeting of key parties in the Free Speech Systems, LLC and Alex E. Jones bankruptcy cases. An agreement for a face to face meeting was announced at the hearing held on March 11, 2024. The Trustee believes that facilitation of discussion at that meeting by Judge Edward L. Morris will greatly assist the parties in their negotiations.

JURISDICTION

2. This Court has jurisdiction by virtue of 28 U.S.C. § 1334. This matter is a core proceeding pursuant to 28 U.S.C. §§ 157(b)(1), (b)(2)(A) and (M).

VENUE

3. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408(1) and (2) and 11 U.S.C. § 101(2)(A).

BACKGROUND

4. Free Speech Systems, LLC (“FSS”) filed a voluntary petition for relief under Chapter 11 Subchapter V of the Bankruptcy Code on July 29, 2022 [Docket No. 1]. On August 2, 2022, Melissa Haselden was appointed Subchapter V Trustee [Docket No. 22].

5. Alex E. Jones (“Jones”) filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code on December 2, 2022 [Docket No. 1].

6. At a hearing conducted on March 11, 2024, the parties announced an agreement to meet face to face in an effort to develop a resolution to these cases. Having observed the dynamic in these unique matters, the Trustee believes that Judge Morris’ moderation of the meeting could prove beneficial to the parties as they conduct their negotiations. Judge Morris agreed to facilitate the meeting if approved by this Court.

7. The Trustee consulted with counsel for FSS, Jones, PQPR, counsel for Neil

Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and Marcel Fontaine (the “Texas Plaintiffs”), and Counsel for David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, and Robert Parker, (the “Connecticut Plaintiffs”), counsel for Dr. David and Carol Jones, and counsel for the Unsecured Creditors Committee (the “UCC”) in the Jones case, (collectively, the “Parties”). The Parties do not oppose the relief requested.

EMERGENCY CONSIDERATION IS APPROPRIATE

8. These cases have been on file for more than a year. For a variety of reasons, a resolution of these cases needs to be reached in short order. Judge Morris agreed to make himself available in Ft. Worth on April 17 and 18, 2024. The Trustee requests that the Court enter this order on an emergency basis to allow sufficient time for the parties and Judge Morris to commence conversations, prepare themselves for the meeting and to make needed travel arrangements.

WHEREFORE, the Trustee prays that the Court enter an order approving Judge Edward L. Morris as a mediator and grant such other and further relief as is just and proper.

DATED: March 25, 2024

/s/ Elizabeth C. Freeman
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Proposed Counsel to Melissa Haselden,
Subchapter V Trustee

CERTIFICATE OF SERVICE

I certify that on March 25, 2024, a copy of this Motion was sent to the parties listed below by the Court's ECF notification system and was send via e-mail to counsel to all parties referenced in paragraph 7.

/s/ Elizabeth C. Freeman
Elizabeth C. Freeman